

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

**JANUARY CREWS-SANCHEZ,**

**Plaintiff,**

**v.**

**FRITO-LAY, INC.,**

**Defendant.**

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**Case No. 6:21CV00030**

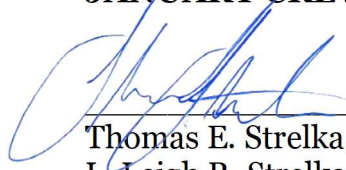
**PLAINTIFF'S SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS TO DEFENDANT**

COMES NOW Plaintiff January Crews-Sanchez, by counsel, and propounds the following Request for Production of Documents to Defendant Frito-Lay, Inc. (hereinafter "Defendant" or "Frito-Lay"), to be answered in accordance with Rule 34 of the Federal Rules of Civil Procedure and to be delivered to the offices of Plaintiff's counsel within thirty (30) days of service hereof.

25. Please provide all documents related to the issuance of any workplace discipline to any employee of Defendant at the Lynchburg facility accused of violating a confidentiality policy or otherwise improperly disclosing confidential information from January 1, 2017 through the date of this request, and include the type of disciplinary action taken including, but not limited to, reprimands, counseling, suspensions with or without pay, demotions, and/or terminations.

**RESPONSE:**

**JANUARY CREWS-SANCHEZ**



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CERTIFICATE OF SERVICE

I hereby certify that, on this 1<sup>st</sup> day of March, 2022, the foregoing Second Request for Production of Documents was sent via electronic mail to:

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